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Defendant.

Magistrate Judge: Norah McCann King

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant OhioHealth Corporation (“OhioHealth” or “Defendant”) makes the following initial disclosures to be supplemented as discovery proceeds. OhioHealth makes the following disclosures subject to, and without waiving, its right to protect from disclosure: (a) all communications protected by the attorney-client privilege; and (b) all documents protected by the attorney work product doctrine. Subject to and without waiving the foregoing objections, OhioHealth makes the following disclosures pursuant to Rule 26(a)(1).

A. Rule 26(a)(1)(A)(i). The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

The following individuals may have discoverable information. With respect to each current and former employee of OhioHealth, contact should be made with such individuals through OhioHealth's attorneys.

1. Laura Stone. Ms. Stone is likely to have discoverable information regarding the allegations in the Complaint filed by Plaintiff against OhioHealth as well as her alleged damages. Ms. Stone's contact information is known to Plaintiff.

2. Nancy Miller. Ms. Miller is a Workplace Accommodations Specialist and is likely to have discoverable information regarding OhioHealth's efforts to accommodate Ms. Stone, Ms. Stone's medical leave of absence, and positions at OhioHealth that were recommended to Ms. Stone following her request that she be placed in a vacant day shift position. Ms. Miller is employed at Riverside Methodist Hospital, 3545 Olentangy River Road, Suite 430, Columbus, Ohio 43214 and her telephone number is 614-566-4246. She should be contacted through counsel for OhioHealth.

3. Rose Cacioppo. Ms. Cacioppo is an Associate Health and Wellness Case Manager and is likely to have discoverable information regarding OhioHealth's efforts in October 2009 to locate a new position for Ms. Stone. Ms. Cacioppo is employed at Riverside Methodist Hospital, 3545 Olentangy River Road, Suite 425, Columbus, Ohio, 43214 and her telephone number is 614-566-3747. She should be contacted through counsel for OhioHealth.

4. Kathy Sipes. Ms. Sipes is an Associate Health and Wellness Case Manager and is likely to have discoverable information regarding OhioHealth's efforts beginning in August 2009 to locate a new position for Ms. Stone. Ms. Sipes is employed at Riverside

Methodist Hospital, Suite 425, Columbus, Ohio 43214 and her telephone number is 614-566-5218. She should be contacted through counsel for OhioHealth.

5. EmmaLee Ponzio. Ms. Ponzio was a Recruiter and is likely to have discoverable information regarding Ms. Stone's application to a Clinical Receptionist position in October 2009, Ms. Stone's application to a Scheduling Coordinator position in October 2009, and information regarding the individual who was selected to fill the Clinical Receptionist and/or Scheduling Coordinator position. Ms. Ponzio, currently the Manager of Talent Acquisition, is employed at OhioHealth Human Resources, 550 Thomas Lane, Columbus, Ohio 43214 and her telephone number is 614-566-2665. She should be contacted through counsel for OhioHealth.

6. Melissa Wolford. Ms. Wolford was a Recruiter and is likely to have discoverable information regarding Ms. Stone's application to a Patient Support Assistant position in July 2009, and information regarding the individual who was selected to fill the Patient Support Assistant position. Ms. Wolford, currently a Human Resources Generalist, is employed at OhioHealth Homecare, 404 East Wilson Bridge Road, Worthington, Ohio 43085 and her telephone number is 614-566-0812. She should be contacted through counsel for OhioHealth.

7. Tonya Clark. Ms. Clark was a Recruiter and is likely to have discoverable information regarding Ms. Stone's application to an Administrative Services Coordinator position in October 2009, Ms. Stone's application to a Senior Medical Records Associate position in November 2009, and information regarding the individual who was selected to fill the Administrative Services Coordinator and/or Senior Medical Records Associate position. Ms. Clark is employed at Doctors Hospital, 5100 West Broad Street, Columbus, Ohio 43228, and her telephone number is 614-544-2219. She should be contacted through counsel for OhioHealth.

8. Amie Sorge. Ms. Sorge was a Recruiter and is likely to have discoverable information regarding Ms. Stone's application to a Patient Support Assistant position in November 2009, Ms. Stone's application to a Patient Support Assistant position in December 2009, and information regarding the individual who was selected to fill the Patient Support Assistant positions. Ms. Sorge is employed at Grant Medical Center, 111 South Grant Avenue, Columbus, Ohio 43215, and her telephone number is 61-566-9229. She should be contacted through counsel for OhioHealth.

9. Celeste Thieman. Ms. Thieman is likely to have discoverable information regarding Ms. Stone's application to a Clinical Receptionist position in October 2009, Ms. Stone's application to a Scheduling Coordinator position in October 2009, information regarding the individual selected to fill the Clinical Receptionist and/or Scheduling Coordinator position, and the reasons why Ms. Stone was not selected for the position. Ms. Thieman is employed at OhioHealth Physicians Group, 180 East Broad Street, Columbus, Ohio 43215, and her telephone number is 614-578-2146. She should be contacted through counsel for OhioHealth.

10. Kerrie Huston. Ms. Huston is likely to have discoverable information regarding the availability of a vacant position at Grady Memorial Hospital in December 2009, and OhioHealth's efforts to recommend Ms. Stone for the position. Ms. Huston is employed at Grady Memorial Hospital, 561 West Central Avenue, Delaware, Ohio 43015 and her telephone number is 740-615-1292. She should be contacted through counsel for OhioHealth.

11. Amiel Mansur. Mr. Mansur is likely to have discoverable information regarding the availability of an internship at the McConnell Heat Health Center Spine and Joint Clinic, the consideration of Ms. Stone for the internship, information regarding the individual who was selected for the internship, and the reasons why Ms. Stone was not selected for the

3. Ms. Stone's medical records, which are maintained by Dr. Stock.

4. Documents related to Ms. Stone's request to OhioHealth on or about August 31, 2009 that she transfer to the day shift, which are maintained by OhioHealth's Associate Health and Wellness Department.

5. Job postings for vacant positions between July 2009 and Ms. Stone's termination, which are maintained by OhioHealth's Human Resources Department.

6. Job postings for the following positions applied to by Ms. Stone between July 2009 and Ms. Stone's termination: three Patient Support Assistant positions at Riverside Methodist Hospital; a Clinical Receptionist position at Riverside Methodist Hospital; a Scheduling Coordinator position at Riverside Methodist Hospital; an Administrative Services Coordinator position at OhioHealth's Corporate Offices; and, a Senior Medical Records Associate position at Riverside Methodist Hospital. All job postings are maintained by OhioHealth's Human Resources Department.

7. Ms. Stone's applications for the following positions she applied to between July 2009 and Ms. Stone's termination: three Patient Support Assistant positions at Riverside Methodist Hospital; a Clinical Receptionist position at Riverside Methodist Hospital; a Scheduling Coordinator position at Riverside Methodist Hospital; an Administrative Services Coordinator position at OhioHealth's Corporate Offices; and, a Senior Medical Records Associate position at Riverside Methodist Hospital. All applications are maintained by OhioHealth's Human Resources Department.

8. Documents related to the cancellation of the Clinical Receptionist position at Riverside Methodist Hospital that Ms. Stone applied to, which are maintained by OhioHealth's Human Resources Department.